

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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ESTATE OF SHANNON J. PAYNE,  
By its Special Administrator,  
CHRISTOPHER MEISEL,

Plaintiff,

CASE NO. 20-CV-512

v.

DANE COUNTY, SHERIFF DAVID J.  
MAHONEY, ABC INSURANCE COMPANY,  
and JOHN DOES 1-20,

Defendants.

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**NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT**

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Dane County, Sheriff David J. Mahoney, ABC Insurance Company, and John Does 1-20 (collectively, "County Defendants"), by their attorneys, MUNICIPAL LAW & LITIGATION GROUP, S.C., respectfully move the Court for an Order dismissing all causes of action alleged against them in the above-captioned matter pursuant to Fed. R. Civ. P. 56.

This Motion is based on the pleadings on file, the County Defendants' Brief in Support of their Motion for Summary Judgment, the County Defendants' Proposed Findings of Fact in Support of their Motion for Summary Judgment, and the Affidavits of Matteo Reginato, Luke Deibele, and Kerry Porter.

Dated this 11<sup>th</sup> day of November, 2021.

**MUNICIPAL LAW & LITIGATION GROUP, S.C.**  
Attorneys for Dane County, Sheriff David J.  
Mahoney, ABC Insurance Company and John Does  
1-20.

By: /s/ Matteo Reginato  
REMZY D. BITAR

State Bar No: 1038340  
MATTEO REGINATO  
State Bar No: 1089724

730 N. Grand Avenue  
Waukesha, WI 53186  
O: (262) 548-1340  
F: (262) 548-9211  
E: [rbitar@ammr.net](mailto:rbitar@ammr.net)  
[mreginato@ammr.net](mailto:mreginato@ammr.net)